

67,010-090; H2616-ED

REMARKS

Applicant has amended this application in response to the office action. Claim 1 is allowable over the prior art. The examiner has rejected the claim over the combination of the Palleggi, et al. patent taken with Blomquist. This rejection is contested. First, there is no suggestion to combine the Blomquist battery, which the examiner reads as a "back-up" power supply to the Palleggi, et al. system. Claim 1 requires that the primary power supply to the at least one motor is AC, and that there is a DC back-up. In the prior art, a redundant pump that was powered by DC power was typically required in the event of an AC power failure. The present invention has eliminated the need for a separate DC powered pump. Palleggi, et al. and Blomquist combined do not teach this feature.

The same is true of the combination of the Cho, et al. patent with Miura, et al. to reject claim 1. Here also there is no proper motivation to combine the references but even if they were combined, they still would not meet the limitations mentioned above.

The sole remaining independent claim is claim 9. Claim 9 stands rejected over the combination of Tisdale, et al. and Cox-Smith, et al. However, this rejection is improper. First, the references cannot be properly combined, in that there is no true motivation to combine the references. Moreover, claim 9 has been amended to make clear that a plurality of distinct fluids are moved by the plurality of fluid-handling devices. As such, the Tisdale, et al. reference can no longer meet the claims. The new dependent claims 18-20 better define the specific fluids, and are further not met by Tisdale, et al.

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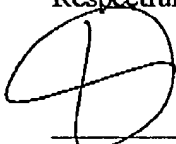
The examiner also rejects these claims over Tisdale, et al. combined with Katagiri, et al. Katagiri, et al. cannot overcome the deficiencies in Tisdale, et al., at least with regard to the distinct fluids being moved.

It is not applicant's contention it invented moving distinct fluids, but rather, that having a single skid and system including a motor for driving fluid handling devices for distinct fluids is novel.

For the reasons set forth above, all claims are allowable. An indication of such is solicited.

Applicant believes that no additional fees are necessary, however, the Commissioner is authorized to charge Deposit Account No. 50-1482 in the name of Carlson, Gaskey & Olds for any additional fees or credit the account for any overpayment.

Respectfully submitted, .

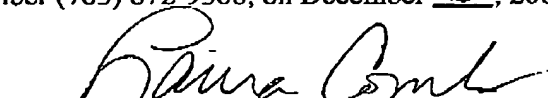


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CERTIFICATE OF TRANSMISSION UNDER 37 CFR 1.8

I hereby certify that this correspondence is being facsimile transmitted to the United States patent and Trademark Office, fax number (703) 872-9306, on December 6, 2005.



Laura Combs